

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI

SHARON GOODEN,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 12-00286-CV-W-DGK
	)	
CITY OF NORTH KANSAS CITY,	)	
MISSOURI, et al.,	)	
	)	
Defendants.	)	

**DEFENDANTS' REPORT ON DISCOVERY CONFERENCE  
AND PROPOSED SCHEDULING ORDER**

COME NOW Defendants, by and through their undersigned counsel of record, and consistent with this Court's July 31, 2012, Order (Doc. No. 43), provide the following Proposed Scheduling Order/Discovery Plan.

1. By August 13, 2012, the parties shall provide each opposing party with the information required by Fed. R. Civ. P. 26(a)(1).

2. Defendants further recommend to the Court the following proposed Rule 16 Scheduling Order:

(a) The proposed closing date for joinder of parties shall be September 14, 2012. This date has been proposed because it will allow the parties sufficient time to engage in preliminary discovery necessary to determine whether the addition of other parties is appropriate.

(b) Any motion to amend the pleadings to add claims shall be filed on or before September 14, 2012. This date has been proposed because it will allow the parties

sufficient time to engage in preliminary discovery to determine whether additional claims are appropriate.

- (c) Defendants propose all discovery motions be filed on or before March 1, 2013. This date has been proposed because it comes sufficiently before the proposed date for the completion of all discovery to allow the timely processing of this file.
- (d) Defendants propose dispositive motions be filed no later than May 1, 2013.
- (e) All other pretrial motions shall be filed no later than 15 days prior to the proposed date the case is set for trial by the Court.
- (f) Defendants propose all pretrial discovery be completed on or before April 1, 2013.

3. With regard to the identification of experts, Defendants propose:

- (a) That Plaintiff identify her expert witnesses and provide the information required by Fed. R. Civ. P. 26 on or before December 14, 2012; and
- (b) That Defendants identify their expert witnesses and provide the information required by Fed. R. Civ. P. 26 on or before February 1, 2013.

4. The Defendants do not anticipate any discovery with regard to electronically stored information.

5. Defendants anticipate this case will take approximately two days to try.

6. Defendants propose it would be appropriate to set this case for trial at some point after October 28, 2013.

7. Defendants anticipate it may be appropriate to seek issuance of a protective order with regard to anticipated discovery in this case. In accordance with Local Rule 16.1(f)(7), any party who

anticipates requesting a protective order shall serve on every other party a proposed protective order and proposed stipulation for its entry before it is submitted to the Court for consideration.

8. Defendants have demanded a trial by jury.

Respectfully submitted,

/s/ David S. Baker  
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*Attorney for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 31<sup>st</sup> day of July, 2012, I electronically filed the above and foregoing with the Clerk of the Court using the CM/ECF system. I further certify that I have caused to be served on the following a true and correct copy of the above and foregoing by depositing same in the United States Mail, postage prepaid, on the 31<sup>st</sup> day of July, 2012:

Sharon Gooden  
P.O. Box 15301  
Shawnee Mission, KS 66285

/s/ David S. Baker  
DAVID S. BAKER